

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF SOUTH CAROLINA**

In re Hannah Louise Greer

Debtor

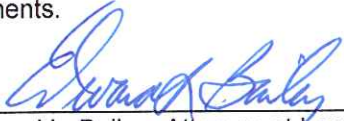
Case No. **13-04088**
Chapter **13**

Objection to §362 Motion of Fay Servicing

Debtor objects to the §362 motion filed by Fay Servicing and requests a hearing on the matter. The particular reasons for opposition, including applicable statutes, rules, and case law, are as follows:

This objection is being filed by Debtor's attorney in order to preserve Debtor's right to a hearing. The property in question is believed to be Debtor's residence and is necessary for an effective reorganization. If there is a post-petition delinquency, it is believed that Debtor would be willing to make reasonable payments to catch up the payments.

11/22/16
Date




Edward L. Bailey, Attorney at Law
251 South Pine Street
Spartanburg, South Carolina 29302
District Court I.D. No. 1153

Certificate of Service

Fay Servicing was served with a copy of debtor's Objection to 362 Motion and Certification of Facts by mailing a copy of the same on the date below, first class mail, postage prepaid, to them at the address below:

Vance L. Brabham, III
Attorney for Fay Servicing
Scott & Corley, P.A.
PO Box 2065
Columbia, SC 29202

11/22/16
Date



Edward L. Bailey, Attorney at Law
251 South Pine Street
Spartanburg, South Carolina 29302
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UNITED STATES BANKRUPTCY COURT
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Debtor

Case No. 13-04088

Chapter 13

Certification of Facts

In the above-entitled proceeding, in which relief is sought from the automatic stay in accordance with 11 USC §362, I do hereby certify to the best of my knowledge the following:

1. Nature of Movant's Interest:
See Movant's Certification of Facts
2. Brief description of security agreement, copy attached (if applicable):
See Movant's Certification of Facts
3. Description of property encumbered by stay (include serial number, lot and block number, etc.)
See Movant's Certification of Facts
4. Basis for relief (property not necessary for reorganization, debtor has no equity, property not property of estate, etc.; include applicable subsection of §362):
See Movant's Certification of Facts
5. Prior adjudication by other courts, copy attached (Decree of foreclosure, Order for possession, levy of execution, etc. (if applicable):
See Movant's Certification of Facts
6. Valuation of property, copy of valuation attached (appraisal, Blue Book, etc.):

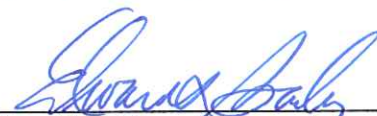
| | | |
|------------------------|----|---------|
| Fair Market Value | \$ | 84,488 |
| Liens (Mortgages) | \$ | 120,805 |
| | \$ | |
| | \$ | |
| Debtor's Exemption (-) | \$ | 0 |
| Net Equity | \$ | 0 |
7. Amount of Debtor's estimated equity (using figures from paragraph 5 above):

| | |
|----|---|
| \$ | 0 |
|----|---|
8. Month and year in which first direct post-petition payment came due to movant (if applicable): **September 2013**
9. (a) For Movant/Lienholder (if applicable): List or attach a list of all post-petition payments received directly from debtor(s), clearly showing date received, amount, and month and year for which each such payment was applied. **See Movant's Certification of Facts.**

(b) For Objecting Party (if applicable): List or attach a list of all post-petition payments included in the movant's list from (a) above which objecting party disputes as having been made. Attach written proof of such payment(s) or a statement as to why such proof is not available at the time of filing this objection. **This objection was filed on an emergency basis in order to protect Debtor's right to a hearing. If any payment history dispute remains unresolved, written proof will be filed in accordance with Local Rule 4001-1.**
10. Month and year for which post-petition account of Debtor(s) is due as of the date of this motion:
See Movant's Certification of Facts.

Date

11/22/16



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Spartanburg, South Carolina 29302
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